

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	C.A. No. 20-613-SB
)	
Plaintiffs/Counterdefendants,)	JURY TRIAL DEMANDED
)	
v.)	
)	PUBLIC VERSION
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**DECLARATION OF JOACHIM B. STEINBERG IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S MOTIONS TO
EXCLUDE PLAINTIFFS' EXPERTS**

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Dated: December 22, 2022
10252217 / 20564.00001
Public Version Dated: January 5, 2023

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FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs/Counterdefendants,

V.

ROSS INTELLIGENCE INC.,

Defendants/Counterclaimant.

C.A. No. 20-613-SB

JURY TRIAL DEMANDED

**HIGHLY CONFIDENTIAL
ATTORNEYS' EYE ONLY
FILED UNDER SEAL**

**DECLARATION OF JOACHIM B. STEINBERG IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S MOTIONS TO
EXCLUDE PLAINTIFFS' EXPERTS**

I, Joachim B. Steinberg, declare as follows:

1. I am employed as counsel at Crowell & Moring, LLP, counsel of record for ROSS Intelligence, Inc. I am an attorney, admitted to the bar of the states of New York and California and have been admitted *pro hac vice* to appear before this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.’s (“ROSS”) Motion to Exclude the Opinions and Testimony of Plaintiffs’ Expert Jonathan L. Krein and ROSS’s Daubert Motion to Exclude Two Opinions of Plaintiffs’ Expert James Malackowski.

2. On December 15, 2022, I, along with Crinesha Berry of Crowell & Moring, LLP and Bindu Palapura of Potter Anderson & Corroon LLP, met and conferred in good faith with counsel for Plaintiffs before bringing these two motions.

3. A true and correct copy of the Opening Expert Report of James E. Malackowski, including its exhibits, served on August 1, 2022, is attached to this Declaration as **Exhibit 1**.

4. A true and correct copy of the Rebuttal Expert Report of Opening Report of James E. Malackowski, including its exhibits, served on September 6, 2022, is attached to this Declaration as **Exhibit 2**.

5. A true and correct copy of Plaintiffs' Third Supplementary Responses and Objections to Interrogatory No. 1, served on August 22, 2022, is attached to this Declaration as **Exhibit 3**.

6. A true and correct copy of U.S. Copyright Office, Circular 65, "Copyright Registration for Automated Databases" (2009) is attached to this Declaration as **Exhibit 4**.

7. A true and correct copy of the Opening Report of Dr. Jonathan L. Krein, including its exhibits, served on August 1, 2022, is attached to this Declaration as **Exhibit 5**.

8. A true and correct copy of the Deposition Excerpts of Jonathan L. Krein (Oct. 22, 2022) is attached to this declaration as **Exhibit 6**.

9. A true and correct copy of the Deposition Excerpts of James Malackowski (Nov. 4, 2022) is attached to this declaration as **Exhibit 7**.

10. A true and correct copy of the Reply Report of Jonathan L. Krein, including its exhibits, served October 10, 2022, is attached to this Declaration as **Exhibit 8**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at San Francisco, California on this 22nd day of December, 2022.

/s/ Joachim B. Steinberg
Joachim B. Steinberg